



PENNONI ASSOCIATES INC.
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June 17, 1998

WARM-9608.002.01

Mr. Lonnie Monaco
Naval Facilities Engineering Command (NAVFACENGCOM)
Northern Division
Environmental Contracts Branch, Mail Stop No. 82
10 Industrial Highway
Lester, PA 19113

RE: Draft Removal Site Evaluation Report - Area A Soils
Former NAWC Warminster

Dear Mr. Monaco:

Based on our review of the above referenced report, we offer the following comments.

1. The EPA reported that the disposal of sludges may have occurred at Site 1 rather than Site 2. If so, does this change the conclusions or remedial actions to be implemented for these sites?
2. Risk was evaluated for both industrial and residential receptors in the Appendix E, however the residential risk has not been summarized in the report for each site. This would be helpful information to evaluate the remediation alternatives.
3. Several organic and inorganic parameters were found with elevated concentrations posing moderate to high risks in the stream sediments. Although the report acknowledged that a likely source was the base, the need for remediation of the stream sediment is not evaluated. In addition, the report states that the risks from PCBs and pesticides in the sediment are mitigated by several factors. No basis is provided for this conclusion.
4. The selection of Alternative 3 (partial excavation and capping of Sites 2 & 3) is justified in the report on the basis that Alternative 2 (excavation of all contaminated soils) will involve a complex confirmatory sampling procedure which may involve extensive excavation.

If confirmatory sampling may require significant additional excavation, then the site characterization is not complete. We believe that the lower cost of Alternative 2 and the removal of contaminants without ongoing operation and maintenance costs makes this the best alternative.

Mr. Lonnie Monaco
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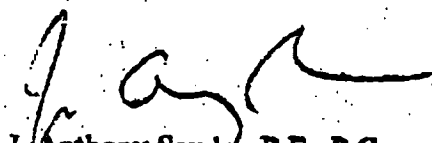
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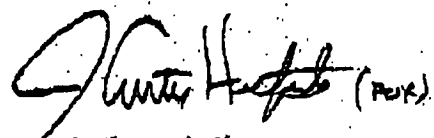
Page -2-

If you have any questions, please do not hesitate to contact us.

Very Truly Yours,

PENNONI ASSOCIATES, INC.


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Senior Hydrogeologist

 (Per)
Anthony S. Bartolomeo, P.E.
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cc: Robert Camerata, Warminster Township
David Fennimore, Earth Data
Darius Ostrauskas, EPA Region III

JAS:dwd

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